

Executive Branch Personnel

Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Best, Daniel

Sr. Advisor to the Secretary for Drug Price Reform, FDA, Department of Health & Human Services

Date of Appointment: 04/01/2018

Other Federal Government Positions Held During the Preceding 12 Months:

None

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ Best, Daniel [electronically signed on 02/11/2018 by Best, Daniel in Integrity.gov]

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ Olesh, Stanley, Certifying Official [electronically signed on 04/12/2018 by Olesh, Stanley in Integrity.gov]

Other review conducted by

/s/ Olesh, Stanley, Ethics Official [electronically signed on 04/12/2018 by Olesh, Stanley in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 04/12/2018

Data Revised 02/20/2018

Data Revised 02/15/2018

Data Revised 02/14/2018

Data Revised 02/13/2018

Comments of Reviewing Officials (public annotations):

PART	#	REFERENCE	COMMENT
N/A	N/A	General	(04/12/2018, Olesh, Stanley): 4/2/18 - rec'd signed EA -- SO
N/A	N/A	General	(04/12/2018, Olesh, Stanley): 4/10/18 - rec'd final divestiture confirmation -- SO

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	CVSHEALTH	Woonsocket, Rhode Island	Corporation	VP Trade Relations	5/2011	3/2018

2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	CVSHEALTH	N/A		Salary/Bonus	\$502,776
2	CVSHEALTH, stock options	N/A	\$50,001 - \$100,000		None (or less than \$201)
3	CVSHEALTH, restricted stock	N/A	\$250,001 - \$500,000		None (or less than \$201)
4	CVSHEALTH Deferred Compensation Plan (single-fund plan)	See Endnote	Yes		None (or less than \$201)
5	CVSHEALTH, anticipated bonus	N/A	\$50,001 - \$100,000		None (or less than \$201)
6	CVSHEALTH	N/A	\$100,001 - \$250,000	Dividends	\$2,501 - \$5,000
7	CVSHEALTH, ESPP account	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
8	Amazon	N/A	\$15,001 - \$50,000		None (or less than \$201)
9	Appian	N/A	\$1,001 - \$15,000		None (or less than \$201)
10	Celgene Corp	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
11	ESRX - Express Script Holding Co.	N/A	\$1,001 - \$15,000		None (or less than \$201)
12	KERX - Keryx Biopharmaceuticals Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)
13	KMI - Kinder Morgan Inc	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
14	TLND - Taland S.A.	N/A	\$1,001 - \$15,000		None (or less than \$201)
15	CSJ - iShares 1-3 yr Credit Bond ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
16	IEMG - iShares Core MSCI Emerging Mkts ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
17	IUSG - iShares Russell 3000 Growth Index ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
18	IAU - iShares Gold Trust	Yes	\$15,001 - \$50,000		
19	EFA - iShares MSCI EAFE ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
20	SCZ - iShares MSCI EAFE small Cap ETF	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
21	IWM - iShares Russell 2000 ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
22	PFF- iShares US Preferred Stock ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
23	XLI - Industrial Select Sector SPDR ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
24	XLF - Financial Select Sector ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
25	XLP - Consumers Staples Select Sector SPDR ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
26	VNQI - Vanguard Global ex-US Real Est ETF	Yes	\$15,001 - \$50,000		\$2,501 - \$5,000
27	BIV - Vanguard Interm-Term Bond ETF	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
28	BCOSX - Baird Core Plus Bond Inv	Yes	\$1,001 - \$15,000		
29	FMIJX - FMI International Fund	Yes	\$15,001 - \$50,000		\$201 - \$1,000
30	OAKIX - Oakmark International Investor	Yes	\$15,001 - \$50,000		\$201 - \$1,000
31	TIIRX - TIAA-CREF Growth & Income Retail	Yes	\$50,001 - \$100,000		
32	USAIX - USAA Income	Yes	\$15,001 - \$50,000		
33	VEMAX - Vanguard Emerging Mkts Stock Idx Adm	Yes	\$50,001 - \$100,000		
34	VEIRX - Vanguard Equity Income Adm	Yes	\$15,001 - \$50,000		\$201 - \$1,000
35	VAIPX - Vanguard Inflation - Protected Secs. Adm	Yes	\$1,001 - \$15,000		
36	VWILX - Vanguard International Growth Adm	Yes	\$15,001 - \$50,000		
37	VFSUX - Vanguard Short Term Inv-Grade Adm	Yes	\$50,001 - \$100,000		
38	SWVXX - Schwab Value Adv. Money Fu	Yes	\$15,001 - \$50,000		
39	Cash	N/A	\$15,001 - \$50,000		
40	VSCPX - Vanguard Small Cap Index Inst. Plus (CVS 401k plan)	Yes	\$250,001 - \$500,000		None (or less than \$201)

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE
1	CVSHEALTH	Woonsocket, Rhode Island	Received options under employee incentive program; will exercise options within 60 days, sell resulting stock, and forfeit any unvested options .	5/2011
2	CVSHEALTH	Woonsocket, Rhode Island	Received Restricted stock under employee incentive program; Will sell vested shares and forfeit remaining shares within 60 days	5/2011
3	CVSHEALTH	Woonsocket, Rhode Island	Deferred compensation plan; Upon my resignation from CVS the full amount will be paid in cash in one lump sum, after which my interest in the plan will terminate.	1/2013
4	CVSHEALTH	Woonsocket, Rhode Island	Bonus to be paid March 2018 under standard company policy. Performance-based, partially based upon individual performance and partially on company financial performance; however, fully based upon 2017 performances, so calculation of final amount will not be affected by any future matters.	1/2011
5	CVSHEALTH	Woonsocket, Rhode Island	Employee Stock Purchase Plan; will terminate participation and sell all CVS stock upon separation.	1/2012
6	CVSHEALTH	Woonsocket, Rhode Island	CVS 401(k) defined contribution plan - underlying holdings reported in Part 2; I intend to roll over this 401k plan into an independent IRA as soon after separation as possible.	5/2011

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	CVSHEALTH	Woonsocket, Rhode Island	VP for Trade Relations

5. Spouse's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	University Hospital (Hospital System), Case Western Reserve Univ., Cleveland, OH	N/A		salary	\$34,698
2	DFSTX - DFA US Small Cap	Yes	\$100,001 - \$250,000		
3	AAPL - Apple Inc	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
4	IWM - iShares Russell 2000 ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
5	IWR - iShares RUSsell Mid Cap ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
6	GTLLX - Glenmede LARge Cap Growth	Yes	\$1,001 - \$15,000		\$201 - \$1,000
7	VeirX - Vanguard Equity Income Adm	Yes	\$1,001 - \$15,000		None (or less than \$201)
8	VFSUX - Vanguard Short Term Inv Grade Adm	Yes	\$1,001 - \$15,000		
9	SAMFX - Virtus Seix total Return Bond I	Yes	\$1,001 - \$15,000		
10	Cash	N/A	\$1,001 - \$15,000		

6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	ANET - Arista Networks Inc	N/A	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	EFA - iShares MSCI EAFE ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
3	IWB - iShares Russell 1000 ETF	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
4	XLY - Consumer Discret Sel Sect SPDR ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
5	VUG - Vanguard Growth ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
6	VFIAX - Vanguard 500 Index Admiral	Yes	\$15,001 - \$50,000		\$201 - \$1,000
7	VWIUX - Vanguard Inter-Term Tax Exempt Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000
8	Cash	N/A	\$1,001 - \$15,000		None (or less than \$201)
9	CSCO - Cisco Systems, Inc	N/A	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
10	MA - Mastercard, Inc	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
11	IWB - iShares Russell 1000 ETF	Yes	\$50,001 - \$100,000		\$201 - \$1,000
12	VTV - Vanguard Value ETF	Yes	\$1,001 - \$15,000		\$201 - \$1,000
13	VGHAX - Vanguard Health Care Adm	Yes	\$15,001 - \$50,000		\$201 - \$1,000
14	VWIUX - Vanguard Inter-Term Tax Exempt Fund	Yes	\$1,001 - \$15,000		\$201 - \$1,000
15	VIMAX - Vanguard Mid Cap Index Adm	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
16	snps - Synopsys, Inc	N/A	None (or less than \$1,001)		None (or less than \$201)
17	IJR - ishares Core S&P Small Cap ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
18	SWPPX - Schwab S&P 300 Index		Yes	\$1,001 - \$15,000		None (or less than \$201)
19	VFINX - Vanguard 500 Index Investor		Yes	\$1,001 - \$15,000		None (or less than \$201)
20	VT - Vanguard Total World Stock ETF		Yes	\$1,001 - \$15,000		None (or less than \$201)
21	AET - Aetna		N/A	\$15,001 - \$50,000		
22	ANTM - Anthem, Inc		N/A	\$1,001 - \$15,000		
23	BIVV - Bioverativ, Inc	See Endnote	N/A	None (or less than \$1,001)		None (or less than \$201)
24	CVS - CVS Health Corp		N/A	\$50,001 - \$100,000	Dividends	\$1,001 - \$2,500
25	DBVT - DBV Technologies S.A.		N/A	\$1,001 - \$15,000		None (or less than \$201)
26	DODFX - Dodge & Cox International Stock		Yes	\$15,001 - \$50,000		\$201 - \$1,000
27	HUM - Humana Inc		N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
28	PPRTF - Passport Potash, Inc	See Endnote	N/A	None (or less than \$1,001)		None (or less than \$201)
29	PRMSX - T. Rowe Price Emerging Markets Stock		Yes	\$15,001 - \$50,000		\$201 - \$1,000
30	RAD - Rite Aid Corporation		N/A	\$1,001 - \$15,000		None (or less than \$201)
31	VFSVX - Vanguard FTSE All-World ex-US Small Cap Inv		Yes	\$15,001 - \$50,000		\$201 - \$1,000
32	VWIGX - Vanguard International Growth Inv		Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
33	WAL - Western Alliance Bancorporation	N/A	\$15,001 - \$50,000	Dividends	\$201 - \$1,000
34	Utah 529 -- 100% in Age-Based Aggressive Global portfolio	Yes	\$100,001 - \$250,000		\$2,501 - \$5,000
35	Condominium, Avon, OH	N/A	\$100,001 - \$250,000		None (or less than \$201)

7. Transactions

(N/A) - Not required for this type of report

8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Chemical Bank	Mortgage (investment/rental property)	\$50,001 - \$100,000	2012	4%	30 year fixed

9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

Endnotes

PART	#	ENDNOTE
2.	4	Single fund tracking basket of five international funds: Templeton Foreign Equity Fund (TFEQX); American Funds EuroPacific Growth Fund (RERGX); Vanguard International Growth Fund (VWILX); Vanguard Total International Stock Index Fund (VTPSX); and (VDIPX) Vanguard Developed Market Index
6.	23	All stock bought by Sanofi in March 2018-- SO
6.	28	Stock has no value.

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

5. Spouse's Employment Assets & Income and Retirement Accounts

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$156 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).
